

CHRISTOPHER CHIOU
Acting United States Attorney
Nevada Bar Number: 14853

SUE P. FAHAMI
Assistant United States Attorney
Nevada Bar Number: 5634
400 South Virginia, Suite 900
Reno, Nevada 89501
Telephone: (775) 784-5438
Sue.P.Fahami@usdoj.gov

MICHAEL C. LANDMAN (N.Y. Bar No. 5423603)
ERIC L. TAFFET (N.Y. Bar No. 5087101)
Trial Attorneys
Tax Division, Western Criminal Enforcement Section
United States Department of Justice
150 M Street NE, Room 2.118
Washington, D.C. 20002
Telephone: (202) 307-6541
Facsimile: (202) 514-9623
Michael.C.Landman@usdoj.gov
Eric.L.Taffet@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

vs.

Saud A. Alessa,
Jackie Hayes
(aka Jackie Bassi), and
Jeffrey Bowen,

Defendants.

Case No: 3:19-CR-00010-MMD-WGC

**Joint Stipulation to Continue
Government's Response Deadline to
Defendant Alessa's Pending Motion
[ECF 162]
(First Joint Stipulation)**

1 IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER
 2 CHIOU, Acting United States Attorney, SUE P. FAHAMI, Assistant United States
 3 Attorney, MICHAEL C. LANDMAN and ERIC L. TAFFET, Trial Attorneys, U.S.
 4 Department of Justice, counsel for the United States of America, RENE L. VALLADARES,
 5 Federal Public Defender, and LAUREN D. GORMAN, Assistant Federal Public Defender,
 6 counsel for SAUD A. ALESSA, and MICHAEL KENNEDY, counsel for JEFFREY
 7 BOWEN, that the government shall have to and including August 10, 2021, to file a response
 8 to Defendant Alessa's pending motion for an order regarding preservation of records and
 9 disclosure of Internal Revenue Service ("IRS") retention policies. *See* ECF No. 162 (the
 10 "Motion").

11 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that
 12 Defendant Alessa and Defendant Bowen shall have to and including August 17, 2021, to file
 13 a reply to any government response to the Motion.

14 The Stipulation is entered into for the following reasons:

- 15 1. The government's response to the Motion is currently due on or before July 27, 2021.
- 16 2. On July 26, 2021, the government conferred with counsel for Defendant Alessa and
 17 counsel for Defendant Bowen, the two parties who have joined the Motion. The
 18 government agreed to provide additional discovery regarding information it had
 19 recently learned regarding IRS retention policies and any attempts made by the IRS
 20 to locate the information sought by Defendant Alessa in the Motion.
- 21 3. The parties agree that, after discovery is produced, the parties may be able to resolve
 22 the Motion without Court intervention.
- 23 4. The additional time requested herein is not sought for purposes of delay, but merely
 24 to allow counsel for the government to provide the information it recently received,

and to allow counsel for Defendants Alessa and Bowen to review the information and make a decision regarding whether it will continue to seek a ruling from the Court on the Motion.

5. This request for a continuance does not effect the currently scheduled trial date. This is the first joint stipulation to continue filed herein.

DATED this 26th day of July, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/Lauren D. Gorman

By:_____

Lauren D. Gorman
Assistant Federal Public Defender
Counsel for SAUD ALESSA

/s/ Michael C. Landman

By:_____

MICHAEL C. LANDMAN
Trial Attorney
Counsel for the United States

MICHAEL J. KENNEDY
Counsel for JEFFREY BOWEN

/s/Michael J. Kennedy

By:_____

MICHAEL J. KENNEDY
Counsel for JEFFREY BOWEN

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 SAUD A. ALESSA,
7 JACKIE HAYES
8 aka Jackie Bassi, and
9 JEFFREY BOWEN
10 Defendants.

Case No. 3:19-CR-0010-MMD-WGC

FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER

9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
11 Court finds that:

- 12 1. The additional time requested herein is not sought for purposes of delay, but merely
13 to allow counsel for the government to provide the information it recently received,
14 and to allow counsel for Defendants Alessa and Bowen to review the information and
15 make a decision regarding whether it will continue to seek a ruling from the Court on
16 the Motion.
- 17 2. This request for a continuance does not effect the currently scheduled trial date.
- 18 3. The parties agree to this continuance.
- 19 4. The defendants are on bond.
- 20 5. This continuance is not sought for purposes of delay.

21 **CONCLUSIONS OF LAW**

22 The continuance sought herein does not affect the currently scheduled trial date and
23 thus has no effect on the Speedy Trial Act.

ORDER

IT IS THEREFORE ORDERED that the government shall have to and including August 10, 2021, to file a response to the Motion (ECF No. 162), and that Defendants Alessa and Bowen shall have to and including August 17, 2021, to file a reply to any government response to the Motion.

DATED this 27th day of July, 2021.

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

MIRANDA M. DU
UNITED STATES DISTRICT JUDGE